

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

JUN 16 2018

UNITED STATES OF AMERICA

V.

JOAQUIN GUILLERMO DAVID-USUGA,  
also known as "Guillermo,"  
JOSE ALFREDO VALENCIA,  
JHONY FIDEL CUELLO-PETRO,  
also known as "Mocho"

**Criminal No.**

**David J. Bradley, Clerk of Court**

18CR 469

## INDICTMENT

## THE GRAND JURY CHARGES:



## COUNT ONE

## (International Cocaine Distribution Conspiracy)

Beginning at least as early as January 2012, the exact date being unknown to the Grand Jury, and continuing thereafter until the return of this Indictment, in the country of Colombia and elsewhere, within the extraterritorial jurisdiction of the United States, the defendants,

JOAQUIN GUILLEMO DAVID-USUGA,  
aka "GUILLEMO,"  
JOSE ALFREDO VALENCIA,  
JHONY FIDEL CUELLO-PETRO,  
aka "MOCHO,"

did knowingly conspire and agree together and with other persons known and unknown to the Grand Jury to manufacture, possess with intent to distribute and distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending, knowing, or having reasonable cause to believe, that such substance would be unlawfully imported into the United States.

In violation of Title 21, United States Code, §§ 963, 959(a), 960(a)(3) and (b)(1)(B).

**COUNT TWO**  
(International Cocaine Distribution)

On or about May 1, 2018, and continuing through on or about May 6, 2018, in the country of Colombia, within the extraterritorial jurisdiction of the United States, defendants

JOAQUIN GUILLERMO DAVID-USUGA,  
aka "GUILLERMO,"  
JOSE ALFREDO VALENCIA,  
and  
JHONY FIDEL CUELLO-PETRO,  
aka "MOCHO,"

did knowingly and intentionally manufacture, possess with intent to distribute and distribute a controlled substance, intending, knowing, or having reasonable cause to believe, that such substance would be unlawfully imported into the United States. The controlled substance involved was more than 5 kilograms, that is, approximately 20 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, §§ 959(a), 960(a)(3) and (b)(1)(B), and Title 18, United States Code, § 2.

**NOTICE OF CRIMINAL FORFEITURE**  
(21 U.S.C. § 853)

Pursuant to Title 21, United States Code, Section 853, the United States gives notice to the defendants,

JOAQUIN GUILLERMO DAVID-USUGA,  
aka "GUILLERMO,"  
JOSE ALFREDO VALENCIA,  
and  
JHONY FIDEL CUELLO-PETRO,  
aka "MOCHO,"

that in the event of conviction of an offense in violation of Title 21, United States Code, Sections 963 or 959, the following property, whether real or personal, is subject to forfeiture to the United States:

1. all property constituting, or derived from, all proceeds obtained, directly or indirectly, as a result of such offense; and
2. all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

**MONEY JUDGMENT: SUBSTITUTE ASSETS**

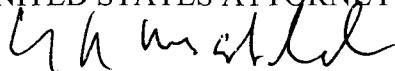
The United States may seek the imposition of a money judgment. In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants in substitution up to the total value of the property subject to forfeiture.

A TRUE BILL      / / / / /

Original Signature on File

REPRESENTATION

RYAN K. PATRICK  
UNITED STATES ATTORNEY



Casey N. MacDonald  
Assistant United States Attorney